

DECLARATION

This affidavit is submitted in support of a complaint for forfeiture of \$127,840.69 in United States currency seized pursuant to the execution of a search and seizure warrant for the residence located at 44 Solar Circle, Apartment B, Baltimore, Maryland and executed on August 13, 2014, for M&T Bank account number xxxxxx6270 held in the name of Terrell Walston and executed on August 13, 2014, and for safe deposit box 3924 at Bank of America, 8108 Loch Raven Boulevard, Baltimore County, Maryland and executed on August 14, 2014, in the state and district of Maryland.

I, Dennis W. Maye, Special Agent of the Drug Enforcement Administration, submit that there are sufficient facts to support a reasonable belief that the \$127,840.69 in United States currency constitutes: (1) money, negotiable instruments, securities and other things of value furnished and intended to be furnished in exchange for a controlled substance in violation of the Controlled Substances Act; (2) proceeds traceable to such an exchange; and (3) money, negotiable instruments, and securities used and intended to be used to facilitate a violation of the Controlled Substances Act in violation of 21 U.S.C. § 841, and therefore is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

- a. During the month of May 2014, members of the Baltimore County Police Department (“BCPD”), Narcotics Section, received a complaint regarding Rhonda Harris (“Harris”) and Terrell Walston (“Walston”) being involved in the distribution of marijuana and prescription medication out of the residence at 44 Solar Circle, Apartment B, Baltimore County, Maryland (“the residence”).

- b. A police canine, trained and certified in the detection of drugs, scanned the threshold of the residence and alerted positively for the presence of the odor of a controlled dangerous substance.
- c. Based on surveillance and an additional positive canine scan, BCPD investigators obtained a search and seizure warrant for the residence.
- d. On August 13, 2014, BCPD officers executed the search and seizure warrant for the residence.
- e. Inside the residence, BCPD officers found the following persons: Harris, Walston, Teria Robinson, Troy Jones (a non-resident), and three juveniles, ages 2, 9, and 14.
- f. Inside Walston's bedroom at the residence, BCPD officers found and recovered:
 - i. two (2) freezer bags containing marijuana;
 - ii. one (1) freezer bag containing four (4) bags of marijuana;
 - iii. one (1) knotted bag of marijuana;
 - iv. ninety-seven (97) Oxycodone pills;
 - v. \$7,745.00 in United States currency;
 - vi. two (2) safe deposit box keys; and
 - vii. a Maryland driver's license in the name of Terrell Walston.
- g. Inside Harris's bedroom at the residence, BCPD officers found and recovered:
 - i. eleven (11) bags of marijuana;
 - ii. one (1) knotted bag of marijuana;
 - iii. one (1) bag of marijuana located in Harris's purse;
 - iv. a digital scale;
 - v. miscellaneous papers in the name of Rhonda Harris;

- vi. \$636.00 in United States currency.¹
- h. Inside the residence, BCPD officers found ottomans/footstools that were hollowed out and contained heat-sealed bags with marijuana residue.
- i. Harris and Walston were arrested and charged with felony controlled dangerous substance violations.
- j. A criminal history check on Walston revealed the following:
 - i. In October 2011, Walston was arrested for possession of a controlled dangerous substance – not marijuana, possession of marijuana, and possession of drug paraphernalia.
 - ii. In March 2012, Walston was arrested for possession with intent to distribute a controlled dangerous substance, and possession of marijuana.
 - iii. In August 2014, Walston was arrested for possession with intent to distribute a controlled dangerous substance, possession of marijuana, and possession of drug paraphernalia.
- k. Harris had no recorded criminal record prior to the felony drug case arising from this investigation.
- l. The \$7,745.00 in United States currency recovered from Walston's bedroom was seized as drug proceeds.
- m. A check made through the Maryland State Wage and Records, which are maintained through the daily course of business, revealed that Walston earned \$2,766.00 in reported legitimate income for the year 2013, and had no reported wages in 2014 prior to the execution of these search and seizure warrants in August 2014.

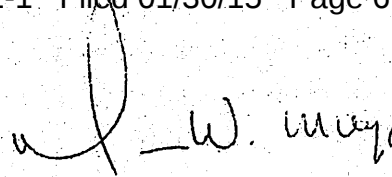
¹ The \$636.00 in United States currency from Harris's bedroom is being processed through the state system.

- n. A check made through the Maryland State Wage and Records, which are maintained through the daily course of business, revealed that Harris earned \$594.00 in reported legitimate income for the year 2013, and had no reported wages in 2014 prior to the execution of these search and seizure warrants in August 2014.
- o. An investigation into the financial records recovered during the execution of the warrant at the residence revealed that Walston held in his name M&T Bank checking account number xxxxxx6270 with a current balance in excess of \$60,000.00.
- p. Subpoenaed financial records revealed that Walston had been making large cash deposits into this account.
 - i. In April 2014, Walston deposited \$20,410.00 cash into this account.
 - ii. In May 2014, Walston deposited \$13,000.00 cash into this account.
 - iii. In June 2014, Walston deposited \$8,000.00 cash into this account.
- q. On August 13, 2014, BCPD officers executed a seizure warrant for Walston's M&T bank account. M&T bank liquidated Walston's checking account number xxxxxx6270 and relinquished a check in the amount of \$60,075.69 made payable to the United States Marshals Service. These funds were seized as drug proceeds.
- r. A follow-up investigation identified that the safe deposit box keys found in Walston's bedroom of the residence belonged to the Bank of America located at 8108 Loch Raven Boulevard, Baltimore County, Maryland.
- s. On August 14, 2014, BCPD officers executed a search and seizure warrant for Bank of America safe deposit box 3924 at the Bank of America located at 8108 Loch Raven Boulevard, Baltimore County, Maryland. Upon opening safe deposit box 3924,

BCPD officers observed several bags filled with United States currency for a total of \$60,020.00. These funds were seized as drug proceeds.

- t. BCPD officers learned that Harris had come into the Bank of America located at 8108 Loch Raven Boulevard, Baltimore County, Maryland, earlier in the day on August 14, 2014, in an attempt to access safe deposit box 3924 and stated that it was an emergency. She was told to come back later in the day because she did not have her keys, and someone would then assist her by drilling the lock to the safe deposit box. Harris returned to the bank while BCPD officers were concluding their activities with this search and seizure warrant. BCPD officers advised Harris of the warrant and explained that the contents of safe deposit box 3924 had been seized.
- u. The defendant property in this civil forfeiture case subject to forfeiture as drug proceeds is a total of \$127,840.69, consisting of \$7,745.00 seized pursuant to the execution of a search and seizure warrant at 44 Solar Circle, Apartment B, Baltimore, Maryland 21234, \$60,075.69 seized pursuant to the execution of a search and seizure warrant for M&T Bank account number xxxxxx6270 held in the name of Terrell Walston, and \$60,020.00 seized pursuant to the execution of a search and seizure warrant for safe deposit box 3924 at Bank of America, 8108 Loch Raven Boulevard, Baltimore County, Maryland.

I DECLARE UNDER PENALTY OF PERJURY PURSUANT TO TITLE 28 U.S.C. § 1746 THAT THE FACTS SUBMITTED BY THE BALTIMORE COUNTY POLICE DEPARTMENT, IN REFERENCE TO THE SEIZURE OF \$127,840.69 IN UNITED STATES CURRENCY FROM TERRELL WALSTON AND RHONDA HARRIS ARE ACCURATE, TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

A handwritten signature in black ink, appearing to read "D. W. Maye", is written above a horizontal line.

Dennis W. Maye
Special Agent
Drug Enforcement Administration